

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**CASE NO. 16-16442-jkf**

**CHAPTER 13**

**OLGA M. DUNIGAN**

**DEBTOR**

**PHH MORTGAGE CORPORATION**

**MOVANT**

**AFFIDAVIT IN SUPPORT OF MOTION FOR RELIEF FROM STAY**

I, Sharon Feeley, being of lawful age and after being duly sworn, states as follows.

- 1 I am employed as a Assistant Vice President by PHH Mortgage Corporation ("Servicer"), the servicer for the mortgage loan at issue in the above-captioned proceeding. The Servicer is providing mortgage loan services to PHH Mortgage Corporation, and is authorized to act on its behalf. I am authorized to make this Affidavit on behalf of the Servicer. The statements set forth in this Affidavit are true and correct to the best of my personal knowledge and belief. Any facts provided by the Servicer that are included in any attachments and submitted to establish the truth of such facts are incorporated herein.
- 2 In the regular performance of my job functions, I have access to and am familiar with business records maintained by the Servicer for the purpose of servicing mortgage loans. I have personal knowledge of the manner in which these business records are created. These records, which include data compilations, electronically imaged documents, and others, are: (a) made at or near the time of the occurrence of the matters set forth by, or from information provided by, persons with knowledge of the activity and transactions reflected in such records and (b) kept as a regular practice and in the ordinary course of business conducted by the Servicer. It is the regular practice of the Servicer to make such

records. To the extent records come from another entity, those records were received by the Servicer in the ordinary course of its business, have been incorporated into and is maintained as part of the Servicer's business records, and have been relied on by the Servicer. The Servicer maintains quality control and verification procedures as part of the boarding process to ensure the accuracy of the incorporated records. In making this Affidavit, I reviewed and relied on the business records concerning the mortgage loan at issue.

3. There has been a default in paying post-petition amounts
4. As of February 12, 2019, the unpaid principal balance on the mortgage loan is \$96,281.85
5. As of February 12, 2019, the Debtor is in default for failure to make timely post-petition payments in the amount of \$2,215.00
6. The total amount of pre-petition arrearage is \$9,171.68 as of the Chapter 13 plan confirmation date.
7. The post-petition payment amount is \$881.26
8. Since the date of the first post-petition default that is continuing and has not been cured, the Debtor has made the following payments: *Please see the payment history attached as an exhibit to the Motion for Relief from Stay.*
9. Fees and/or charges applied to the above-referenced post-petition amount since the filing of Debtor's petition are as follows:

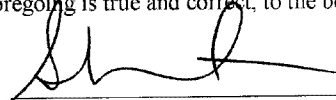
NONE

*[This Space Intentionally Left Blank]*

10 As of the date of this Affidavit, the total amount of the claim is \$103,564.77 and the total amount required for the Debtor to cure the default is \$2,215.00

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge and belief

By.



Signature of Affiant

Sharon Feeley

Printed Name of Affiant

Dated: 4-15-19

On behalf of PHH Mortgage Corporation

Its

Assistant Vice President

Affiant's Title

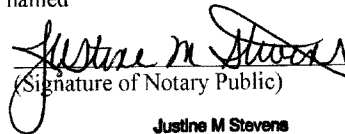
STATE OF New Jersey )

COUNTY OF Burlington )

SS. Mt. Laurel

Sworn to (or affirmed) and subscribed before me this 15<sup>th</sup> day of April, 2019, by Sharon Feeley (Name of Affiant), personally known to me to be the person who executed this Affidavit on behalf of the entity therein named

WITNESS my hand and official seal



(Signature of Notary Public)

Justine M Stevens

(Print, type or stamp commission name of Notary Public)

My Commission Expires

January 22, 2023

JUSTINE M STEVENS  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
MY COMMISSION EXPIRES JANUARY 22, 2023  
No. 2106715